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March 16, 2023

VIA ELECTRONIC FILING

The Honorable Stephanos Bibas
James A. Byrne United States Courthouse
601 Market Street
Philadelphia, PA 19106

Re: *Thomson Reuters Enterprise Centre GmbH et al. v. ROSS Intelligence Inc.*,
C.A. No. 20-613-SB

Dear Judge Bibas:

The parties in the above-referenced matter write to request a briefing schedule and discovery teleconference.

First, the following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a final meet-and-confer by telephone on February 17, 2023:

Delaware Counsel for Plaintiffs/Counterclaim Defendants: Michael Flynn

Lead Counsel for Plaintiffs/Counterclaim Defendants: Cameron Ginder, Vanessa Barsanti

Delaware Counsel for Defendant/Counterclaim Plaintiff: Bindu Palapura

Lead Counsel for Defendant/Counterclaim Plaintiff: Joachim B. Steinberg, Shira Liu, Jacob Canter, Anna Saber

The first dispute requiring judicial attention, listed below, is related to Plaintiffs' Objections and Responses to ROSS's First Set of Counterclaim Requests for Production:

- The temporal limitation of Plaintiffs' responses to ROSS RFP Nos. 185-187, 191-193, 196-198, 205-206, and 210-233

Second, the following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a final meet-and-confer by telephone on March 3, 2023:

Delaware Counsel for Plaintiffs: Michael Flynn

Lead Counsel for Plaintiffs: Vanessa Barsanti, Cameron Ginder

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Delaware Counsel for Defendant: David Moore

Lead Counsel for Defendants: Shira Liu, Joachim Steinberg, Jacob Canter

The second dispute requiring judicial attention, listed below, is related to Plaintiffs' Objections and Responses to ROSS's Second Set of Counterclaim Requests for Production

- RFP No. 246 ("The source code for [Plaintiffs'] LEGAL SEARCH TOOLS and PUBLIC LAW DATABASES")

Respectfully,

/s/ Bindu A. Palapura

Bindu A. Palapura

BAP:nmt/10684362/20516.00001

cc: Counsel of record (via electronic mail)